

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

SKO DESIGN GROUP, LLC, a
Michigan Limited Liability Corporation,

Case No.:

Plaintiff,

State Court Case: 24-10766-CK
17th Circuit Court (Kent County)

v.

GRAND RAPIDS COMMUNITY
COLLEGE, an MCL 289.103 Corporate
Body,

Defendant.

_____/

**NOTICE OF REMOVAL OF CAUSE TO THE UNITED STATES
DISTRICT COURT FOR THE WESTERN DISTRICT
OF MICHIGAN, SOUTHERN DIVISION**

TO: United States District Court for the Western District of Michigan.

NOW COMES DEFENDANT, by and through its attorneys, McGraw Morris, P.C., and pursuant to 28 U.S.C. § 1441(b) and § 1446, file this Notice of Removal for the following reasons:

1. Plaintiff filed a Complaint against Defendant in the 17th Circuit Court for the County of Kent, State of Michigan, Docket No. 24-10766-CK. A copy of the Summons and Complaint is attached as Exhibit 1.
2. The Complaint was served on Defendant's Vice President of Finance and Administration on December 3, 2024. This case is timely removed and otherwise removable pursuant to the statutes of the United States of America.
3. As set forth in the Complaint, Plaintiff brings this action under the Constitution of the United States of America, specifically asserting a claim under 42 U.S.C. § 1983, for deprivation of federal constitutional rights.

4. The action filed by Plaintiff is one which the District Court of the United States would have original jurisdiction under 28 U.S.C. § 1331, a civil action arising under the Constitution of the United States of America. Specifically, Plaintiff alleges violation of the Fourteenth Amendment of the United States Constitution.

5. Pursuant to 28 U.S.C. § 1446(d), Counsel certifies that a copy of this Notice of Removal will be served upon Plaintiff's Counsel, and a written Notice of this Notice of Removal will be timely filed with the Clerk of the Court of the 17th Circuit Court for the County of Kent, State of Michigan.

McGraw Morris, PC
Attorneys for Defendant

Dated: December 23, 2024

/s/ Craig R. Noland
Craig R. Noland (P30717)
McGRAW MORRIS P.C.
44 Cesar E. Chavez Avenue, SW, Suite 200
Grand Rapids, MI 49503
(616) 288-3700/Fax (248) 502-4001
cnoland@mcgrawmorris.com